

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of )  
 )  
Petition for Waiver of the Nebraska Farm Bureau to )  
Participate in Mobility Fund Phase II Challenge )  
Process )

To: The Commission

**PETITION OF THE NEBRASKA FARM BUREAU  
FOR WAIVER TO PARTICIPATE IN CHALLENGE PROCESS**

The Nebraska Farm Bureau (“NEFB”) respectfully seeks a waiver to participate in the Mobility Fund Phase II (“MF-II”) challenge process. NEFB is neither a governmental entity nor a carrier required to file Form 477 data with the Commission; as such, it is not entitled to participate in the challenge process as a matter of right. In adopting the rule governing challenge eligibility, however, the Commission stated that, “If a consumer, organization, or business believes that its interests cannot be met through its state, local, or Tribal government entity and wishes to participate in the process as a challenger, the individual or entity may file a petition with the Commission requesting a waiver for good cause shown.” And that the Commission, “...anticipate[s] granting waivers in cases in which a ... business demonstrates a bona fide interest in the challenge process and a plausible ability to submit a valid challenge.”<sup>1</sup> As shown below, NEFB meets these criteria.

**NEFB has a bona fide interest in the challenge process.** NEFB was formed in 1917 as a not-for-profit advocacy organization dedicated to supporting farm and ranch families and working for the benefit of all Nebraskans through a wide variety of educational, service and advocacy efforts.

*<sup>1</sup>MOBILITY FUND PHASE II CHALLENGE PROCESS HANDSETS AND ACCESS PROCEDURES FOR THE CHALLENGE PROCESS PORTAL, Sec. II, Para. 9.*

NEFB is a grassroots organization with more than 61,000 member families in all 93 counties in Nebraska, of which nearly 14,000 are actively involved in farming and ranching.

As an organization representing and advocating on behalf of our members in every county in the state of Nebraska, NEFB has an interest in promoting reliable 4G LTE service around the state. Agriculture equipment and operations are becoming increasingly reliant on high-speed internet access. Our farm and ranch members increasingly rely on 4G LTE service, and a rapidly growing number of farmers conduct business through their phone. From checking grain and livestock prices to dealing with equipment breakdowns, 4G LTE is essential to helping improve the way modern producers manage their operations and natural resources. Additionally, farming and ranching is one of the most dangerous professions in the nation. Access to 4G LTE service in remote locations where this work is happening is essential to providing timely emergency services.

Moreover, members of NEFB live, work, and raise families in communities of all sizes. 4G LTE service will allow them to pursue educational and business-related endeavors, and will connect residents, businesses, healthcare facilities and community facilities such as schools, libraries and first responders, regardless of their population. Until a reliable wired broadband infrastructure connects all Nebraskans to the digital world, hotspots powered by 4G LTE are essential.

**NEFB has a plausible ability to submit a valid challenge.** With members located in every corner of the state, NEFB can quickly identify areas which may currently be underserved by 4G LTE providers. Additionally, NEFB employs regional staff who will be able to verify information provided by our members and relay it back to our headquarters to compile and remit

to the Commission for use in the MF-II challenge process. We are aware of the handset requirements of the challenge process, and are prepared to meet them.

**Additional information.** The Commission requires waiver applicants to “submit the first and last name of the user(s) that should have access to the portal on its behalf, and the email address(es) of the user(s), up to a maximum of three users, as part of its petition for waiver.”<sup>2</sup> NEFB provides the following information regarding the users that should have access to the challenge process portal on its behalf:

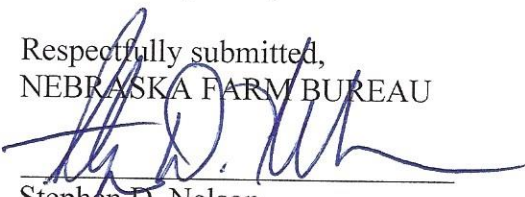
Bruce Rieker (brucer@nefb.org)

Ansley Mick (ansleym@nefb.org)

Jordan Dux (jordand@nefb.org)

\* \* \*

For all of these reasons, NEFB respectfully requests a waiver to participate in the MF-II challenge process.

Respectfully submitted,  
NEBRASKA FARM BUREAU  
By:   
Stephen D. Nelson  
President

Rob Robertson  
Chief Administrator

NEBRASKA FARM BUREAU  
5225 S. 16<sup>th</sup> Street  
P.O. Box 80299  
Lincoln, NE 68501  
(402) 421-4401

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<sup>2</sup> *MOBILITY FUND PHASE II CHALLENGE PROCESS HANDSETS AND ACCESS PROCEDURES FOR THE CHALLENGE PROCESS PORTAL, Sec. II, Para. 8.*